

**REMARKS**

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-3 and 10-11 are currently pending in the application and subject to examination.

In the Office Action mailed August 10, 2005, the title was objected to; claims 1-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2002-0081873, to Harris et al. (hereinafter, "Harris"); and claims 1-17 were rejected under 35 USC § 103(a) as being unpatentable over U.S. Patent Application No. 2005-0060479 to Deng et al. (hereinafter, "Deng"). The Applicant hereby traverses the rejections, as follows.

**Title Objection**

The outstanding Office Action objects to the title as not being descriptive. Applicants have amended the title so that the title is now descriptive. Accordingly, Applicant requests reconsideration and withdrawal of the objection to the title.

**Asserted Rejection of Claims 1-17 as Being Unpatentable over Harris**

The outstanding Office Action asserts that Harris teaches all of the features of claims 1-17 by allegedly teaching "the equivalent functions of converting USB standard and ATA or ATAPI standards." Office Action, p. 2. The Office Action further asserts that Harris accomplishes a conversion function "that is identical to the claimed invention." Id. The Office Action admits, however, that Harris fails to teach or suggest the detailed method and device for performing a conversion recited in the claimed invention. The Office Action instead asserts that "one skilled in the art can easily understand

operations and functions of converting different standards, as claimed,” and that, therefore, “it would have been obvious at the time the invention was made to one having ordinary skill in the art to come up with the claimed invention from the teachings of Harris reference.” Id. at pp. 2-3. The only support provided by the Office Action for making the aforementioned assertion is, “the bridge chip (100) comprehensively [teaches] the functions and structures of the first, second & switching controller of the claimed invention.” Id. at p. 2.

The Applicant submits, however, that the bridge chip 100 of Harris does not include a first command converter, a second command converter, and/or a switching controller, as recited in the claimed invention. Moreover, Harris neither discloses nor suggests, with respect to bridge chip 100 or anywhere else in the specification and drawings thereof, at least the combination of a first command converter for converting a command between one complying with a first interface standard and one complying with a second interface standard; a second command converter for converting a command between one complying with the first interface standard and one complying with a third interface standard; and a switching controller for checking whether the interface of the device complies with the second interface or the third interface and selects the first command converter or the second command converter in accordance with the checking result, as recited in claim 1.

Section 2143 of the MPEP states:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference

teachings. Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.**

The teaching or suggestion to make the claimed combination and the reasonable expectation of success **must both be found in the prior art, not in applicant's disclosure.** In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Emphasis added.

As described above, Harris neither teaches nor suggests each and every feature recited in claim 1. Specifically, Harris neither teaches nor suggests at least the features of a first command converter for converting a command between one complying with a first interface standard and one complying with a second interface standard; a second command converter for converting a command between one complying with the first interface standard and one complying with a third interface standard; and a switching controller for checking whether the interface of the device complies with the second interface or the third interface and selects the first command converter or the second command converter in accordance with the checking result, as recited in claim 1. For at least this reason, the Applicant submits that claim 1 is allowable over Harris. As claim 1 is allowable over Harris, the Applicant submits that claims 2-9, which depend from allowable claim 1, are likewise allowable over Harris.

As discussed above with regard to claim 1, the Applicant submits that claim 10 is allowable over Harris at least because Harris does not disclose or suggest at least the combination of connecting the interface of the device to an interface converter having first and second command converters, which convert commands from compliance with the first interface standard to compliance with the second or third interface standard, respectively; checking whether the interface of the device connected to the interface

converter complies with the second interface standard or the third interface standard; and selecting the first command converter or the second command converter in accordance with the result of said checking, as recited in claim 10. As claim 10 is allowable over Harris, the Applicant submits that claims 11-12, which depend from allowable claim 10, are likewise allowable over Harris.

As discussed above with regard to claims 1 and 10, the Applicant submits that claim 13 is allowable over Harris at least because Harris does not disclose or suggest at least the combination of a first command converter for converting a command between one complying with the first interface standard and one complying with the second interface standard; a second command converter for converting a command between one complying with the first interface standard and one complying with the third interface standard; and a switching controller for checking whether the interface of the second device complies with the second interface or the third interface and activating the first command converter or the second command converter in accordance with the checking result, as recited in claim 13. As claim 13 is allowable over Harris, the Applicant submits that claims 14-15, which depend from allowable claim 13, are likewise allowable over Harris.

In addition, as discussed above with regard to claims 1, 10 and 13, the Applicant submits that claim 16 is allowable over Harris at least because Harris does not disclose or suggest at least the combination of providing first and second command converters, which convert a command between one complying with the first interface standard and one complying with the second or third interface standard, respectively; checking whether the interface of the second device complies with the second interface standard

or the third interface standard; and activating the first command converter or the second command converter in accordance with the result of said checking, as recited in claim 16. As claim 16 is allowable over Harris, the Applicant submits that claim 17, which depends from allowable claim 16, is likewise allowable over Harris.

**Asserted Rejection of Claims 1-17 as Being Unpatentable over Deng**

In the outstanding Office Action, claims 1-17 were rejected under 35 USC § 103(a) as being unpatentable over Deng. The Applicant hereby traverses the rejection, as follows.

The present application has a foreign priority date of September 30, 2002. U.S. Patent Application No. 2005-0060479 to Deng et al. has a U.S. filing date of August 29, 2003. Thus, Deng is not available as a prior art reference to the subject application and any rejection based thereon is improper.

A verified translation of the priority document, i.e., Japanese Patent Application No. 2002-286475, is filed herewith. Thus, priority of the subject application is perfected, and withdrawal of this rejection is requested.

**Conclusion**

For all of the above reasons, it is respectfully submitted that the pending claims patentability distinguish the present invention from the cited references. Accordingly, reconsideration and withdrawal of the outstanding rejections and an issuance of a Notice of Allowance are earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is requested to contact the undersigned representative at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this communication to Deposit Account No. 01-2300, referencing docket no. 108075-00118.

Respectfully submitted,

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CMM/MLC/vdb

Enclosures: Petition for Extension of Time  
Verified Translation of Priority Document